

FILED DEC - 2 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
CIVIL DIVISION

----- x
LESLIE WILSON,

Plaintiff,

v.

Civil Action No. 02-CV-4662 (BWK)

PPL ELECTRIC UTILITIES
CORPORATION,

Defendant.

----- x

JOINT RULE 16 MEMORANDUM

Pursuant to this Court's Order dated October 28, 2002, Plaintiff Leslie Wilson ("Plaintiff") and Defendant PPL Electric Utilities Corporation ("Defendant") file this Joint Rule 16 Memorandum. The counsel for both parties participated in the meeting as required by Fed. R. Civ. P. 16 and 26 by telephone on November 27, 2002 and subsequently prepared the following report.

1. A Proposed Schedule For Remaining Pretrial Proceedings Setting Forth The Time Limits For:

- (a) The deadline for joining other parties and to amend the pleadings: January 15, 2003.
- (b) The deadline for filing non-dispositive motions: June 1, 2003.
- (c) The deadline for completing discovery: June 1, 2003.
- (d) The deadline for filing pretrial memoranda pursuant to Federal Rule of Civil Procedure 26(a)(3) and Local Rule of Civil Procedure 16.1(c): September 1, 2003.
- (e) The deadline for exchanging exhibits: September 15, 2003.

- (f) The deadline for exchanging experts' reports:
 - (i) Plaintiff's report due on May 1, 2003.
 - (ii) Defendant's rebuttal report due on June 1, 2003.
- (g) The deadline for filing dispositive motions: July 1, 2003.

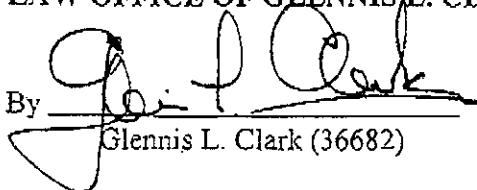
2. A Statement On Each Of The Following:

- (a) The prospects of amicable settlement:
 - (i) Plaintiff requires additional time to formulate a settlement demand.
 - (ii) Defendant is unable to comment on the prospect of amicable settlement as Plaintiff has not made a settlement demand in this matter.
- (b) Referral of this case to U.S. Magistrate Judge Jacob P. Hart for trial:
 - (i) Plaintiff respectfully declines referral of this case to U.S. Magistrate Judge Jacob P. Hart for trial.
 - (ii) Defendant respectfully declines referral of this case to U.S. Magistrate Judge Jacob P. Hart for trial.
- (c) Estimated length of trial:
 - (i) Plaintiff will require 3-4 days to present his case at trial.
 - (ii) Defendant will require 3-4 days to present its case at trial.
- (d) The basis for the Court's jurisdiction:
 - (i) Plaintiff states that the basis for this court's jurisdiction is 28 U.S.C. §1333 (a)(3), (4).
- (e) Any other matter that may facilitate the just, speedy, and inexpensive disposition of this case:
 - (i) All disclosures required by Rule 26(a)(1) shall be completed on or before December 15, 2002.
 - (ii) Plaintiff will respond to Defendant's outstanding document requests and interrogatories by December 31, 2002.

3. All counsel have conferred upon each of the above matters and approve of the contents of this Rule 16 Memorandum.

LAW OFFICE OF GLENNIS L. CLARK

By



Glennis L. Clark (36682)

532 Walnut Street
Allentown, Pennsylvania 18101
Phone: (610) 433-6624
Fax: (610) 434-1194

Attorneys for Plaintiff

Date: Dec. 2, 2002

PROSKAUER ROSE LLP

By



Bernard M. Plum
Daniel R. Halem
1585 Broadway
New York, New York 10036
Phone: (212) 969-3000
Fax: (212) 969-2900

GROSS, MCGINLEY, LABARRE &
EATON LLP

Malcolm J. Gross (08137)
33 South Seventh Street
P.O. Box 4060
Allentown, Pennsylvania 18105
Phone: (610) 820-5450
Fax: (610) 871-1329

Attorneys for Defendant

Date: November 27, 2002